

EXHIBIT B

RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
[1-P] A finger-worn wearable ring device, comprising:	<p>Plaintiff asserts that the preamble is limiting. The Accused Products are a finger-worn wearable ring device:</p> 

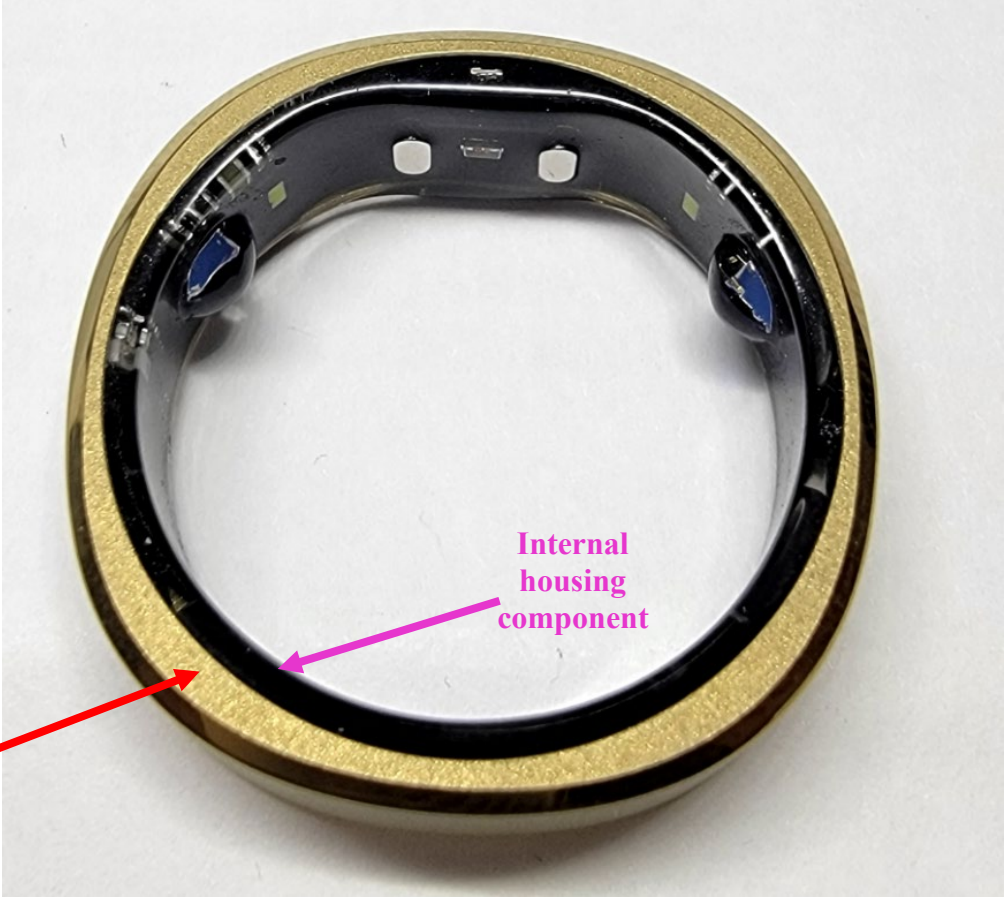
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	


RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p>Accurate Health Starts on Your Finger</p> <p>Unlike wrist-worn smartwatches, the RingConn Gen 2 Smart Ring utilizes the finger's thin skin and abundant capillaries for precise tracking. Despite its slim design, the RingConn Gen 2 incorporates advanced PPG sensors, temperature sensors, and 3D accelerometers to ensure exceptional accuracy.</p>
<p>[1-A] an external housing component defining an outer circumferential surface of the finger-worn wearable ring device</p>	<p>The Accused Products include an external housing component defining an outer circumferential surface of the finger-worn wearable ring device. If RingConn argues that the claimed element of “external housing component defining an outer circumferential surface” is not literally met (Plaintiff disputes any such characterization), this limitation is satisfied under doctrine of equivalents because any difference between the claim element and the accused element is insubstantial. Indeed, the accused element (i.e., outer metallic surface) performs substantially the same function, in substantially the same way, to achieve substantially the same result as the claimed “external housing component defining an outer circumferential surface,” because the accused element includes a substantially curved, circular, and/or peripheral surface to allow the finger-worn wearable ring device to conform to user’s fingers and to create space to house battery and flexible printed circuit board components.</p>

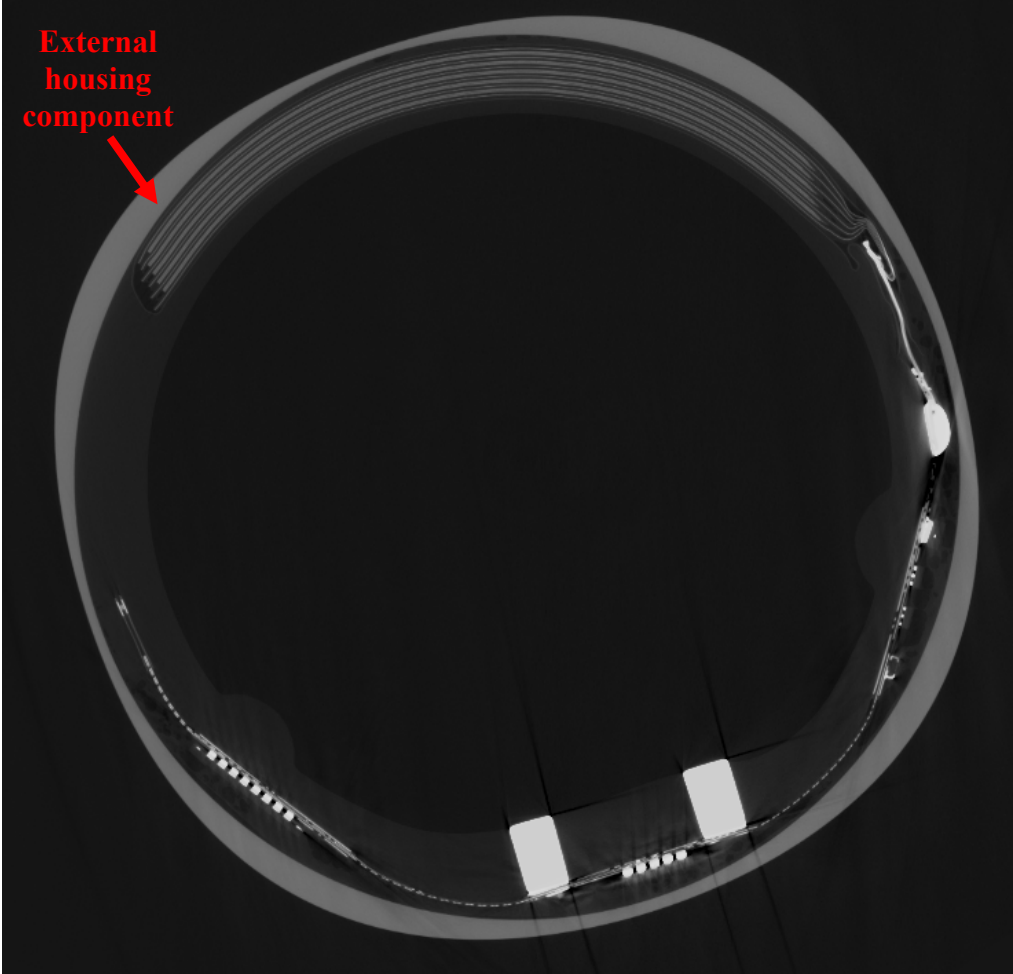
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p data-bbox="472 1036 630 1141">External housing component</p> <p data-bbox="1165 846 1320 951">Internal housing component</p>

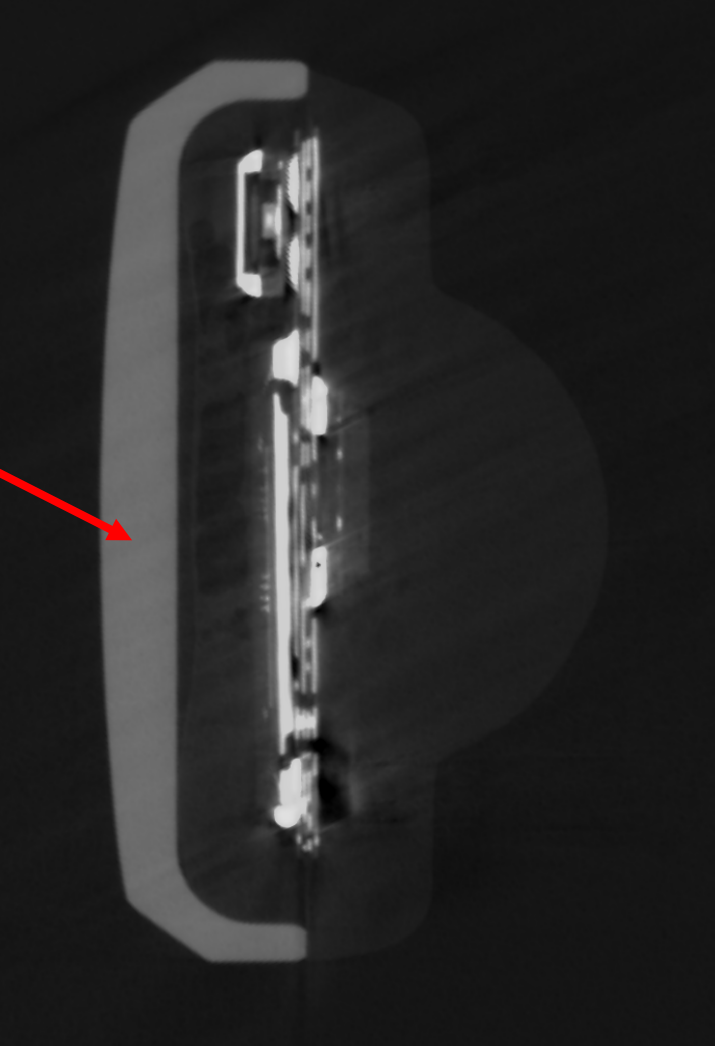
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p data-bbox="737 1029 890 1133">External housing component</p> <p data-bbox="1696 1052 1911 1156">Outer circumferential surface</p>


RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	

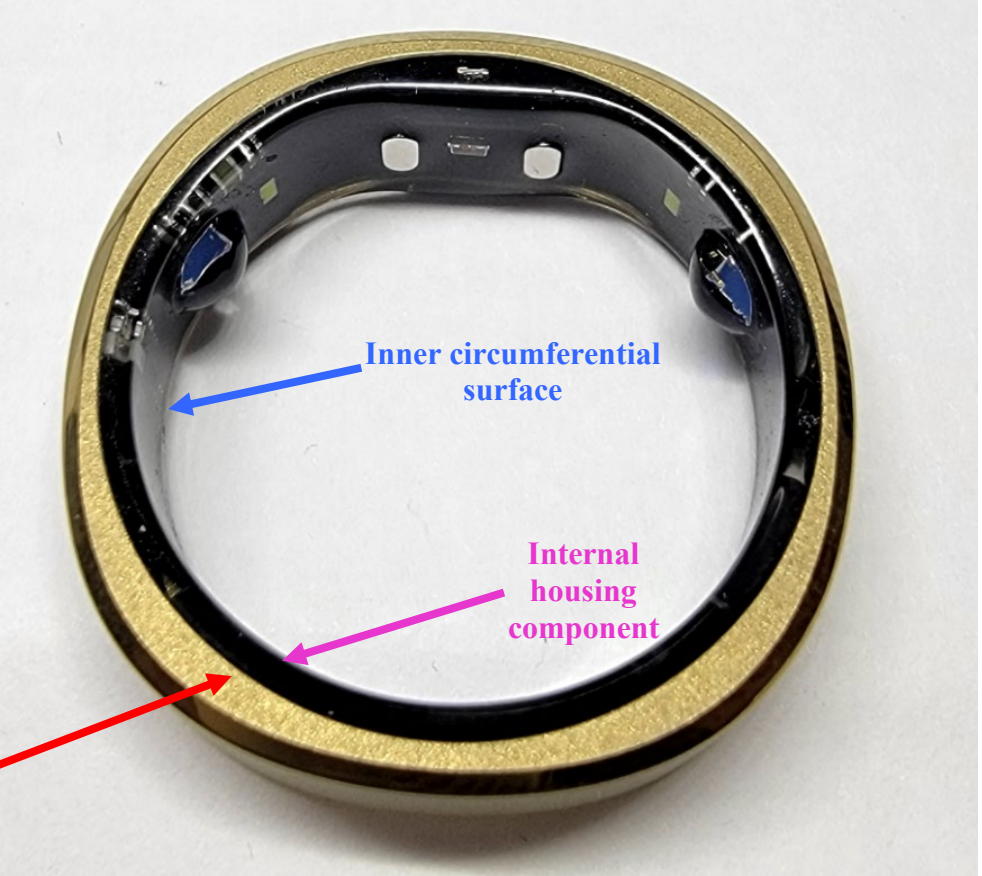
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)	
		 <p data-bbox="493 621 646 727">External housing component</p>

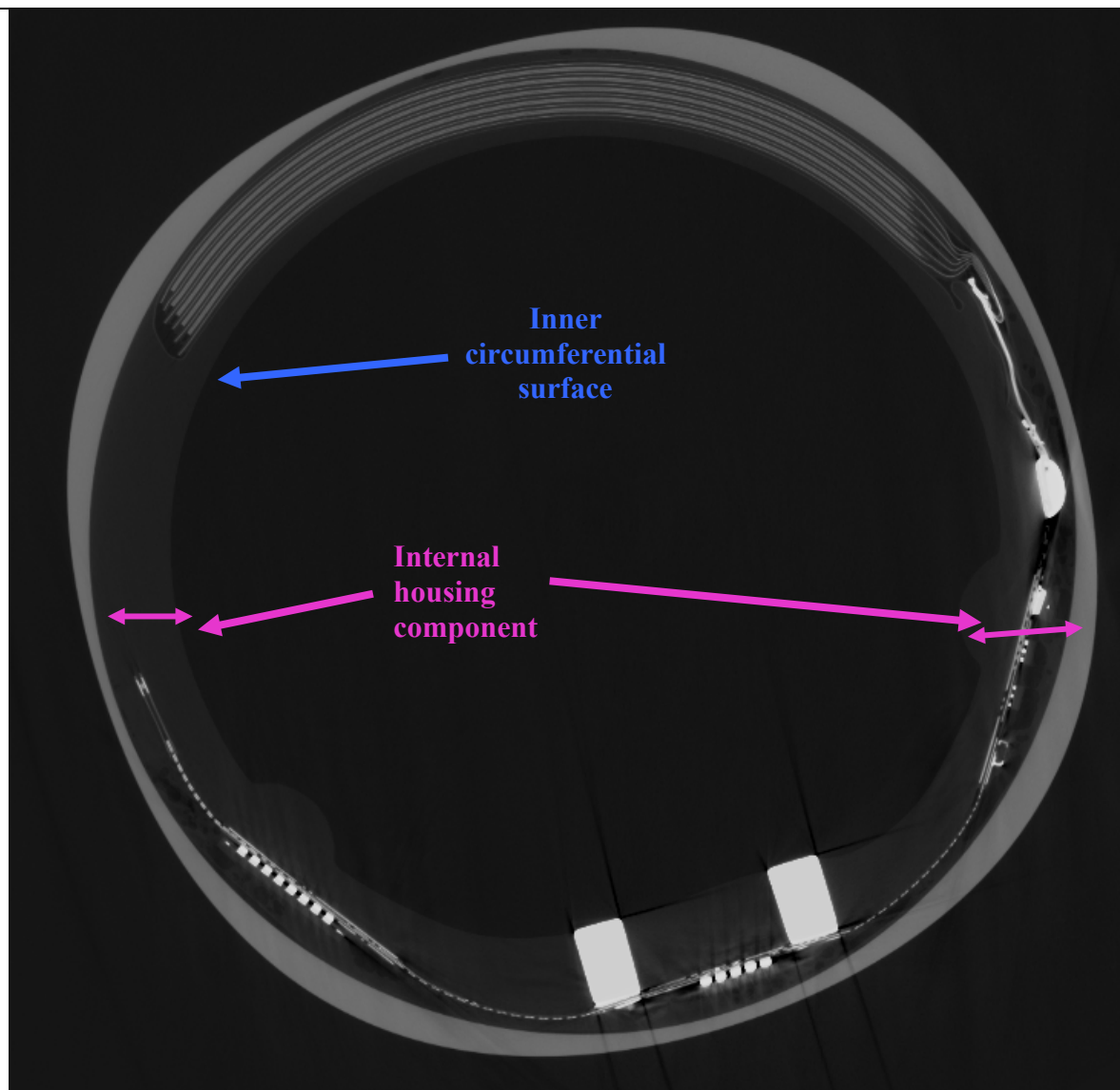
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p>The image shows an exploded view of the RingConn Smart Ring. On the left is the external housing component, a metallic ring. In the middle is the internal housing component, a clear, circular ring. On the right is the internal component, a curved circuit board with a red LED and a green LED. A red arrow points to the outer circumferential surface of the external housing component, with the text 'External housing component having an outer circumferential surface' in red above it.</p>
<p>[1-B1] an internal housing component defining an inner circumferential surface of the</p>	<p>The Accused Products include an internal housing component defining an inner circumferential surface of the finger-worn wearable ring device. If RingConn argues that the claimed element of “internal housing component defining an inner circumferential surface” is not literally met (Plaintiff disputes any such characterization), this limitation is satisfied under doctrine of equivalents because any difference between the claim element and the accused element is insubstantial. Indeed, the accused element (i.e., potting material used to enclose space on the internal portion of the ring) performs substantially the same function, in substantially the same way, to achieve substantially the same result as the</p>

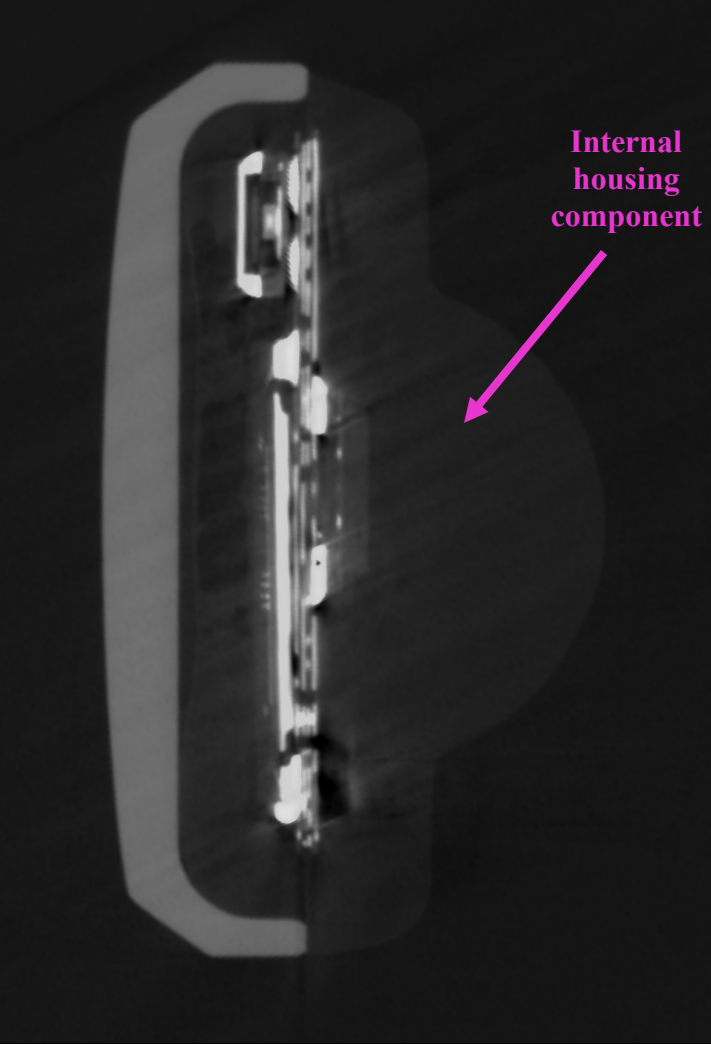
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
finger-worn wearable ring device,	<p>claimed “internal housing component,” and includes a substantially curved, circular, and/or peripheral surface to allow the finger-worn wearable ring device to conform to user’s fingers and to create space to house battery and flexible printed circuit board components.</p>  <p>Inner circumferential surface</p> <p>Internal housing component</p> <p>External housing component</p>

RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178



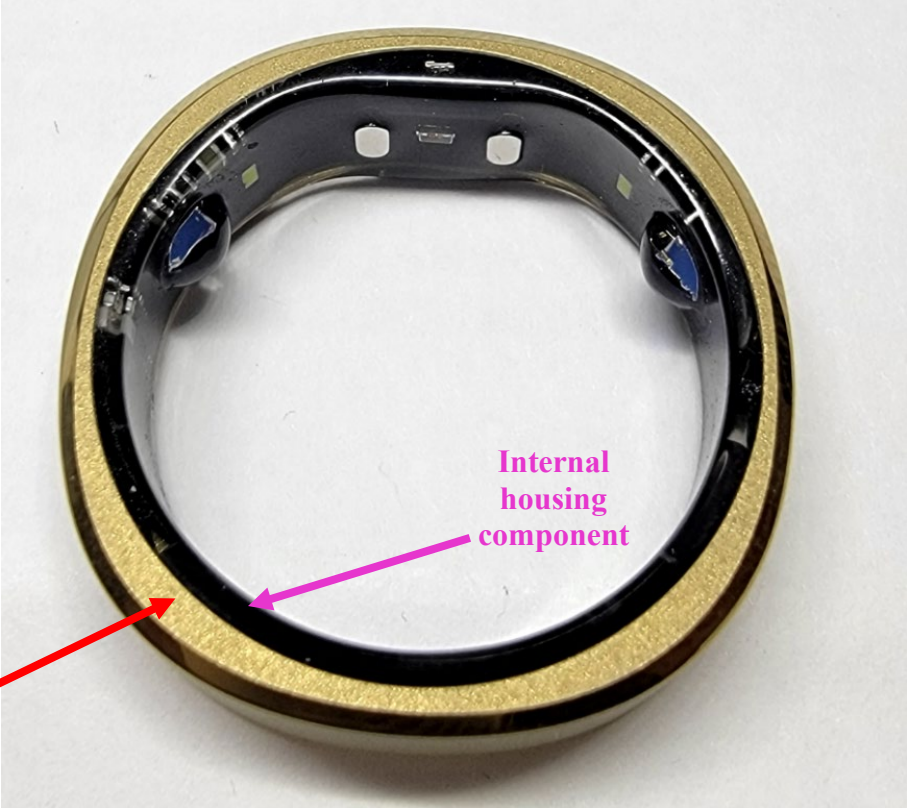
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)		
		 A grayscale photograph of a RingConn Smart Ring, Gen. 1 and Gen. 2, showing its internal housing component. A pink arrow points to the internal housing component.	

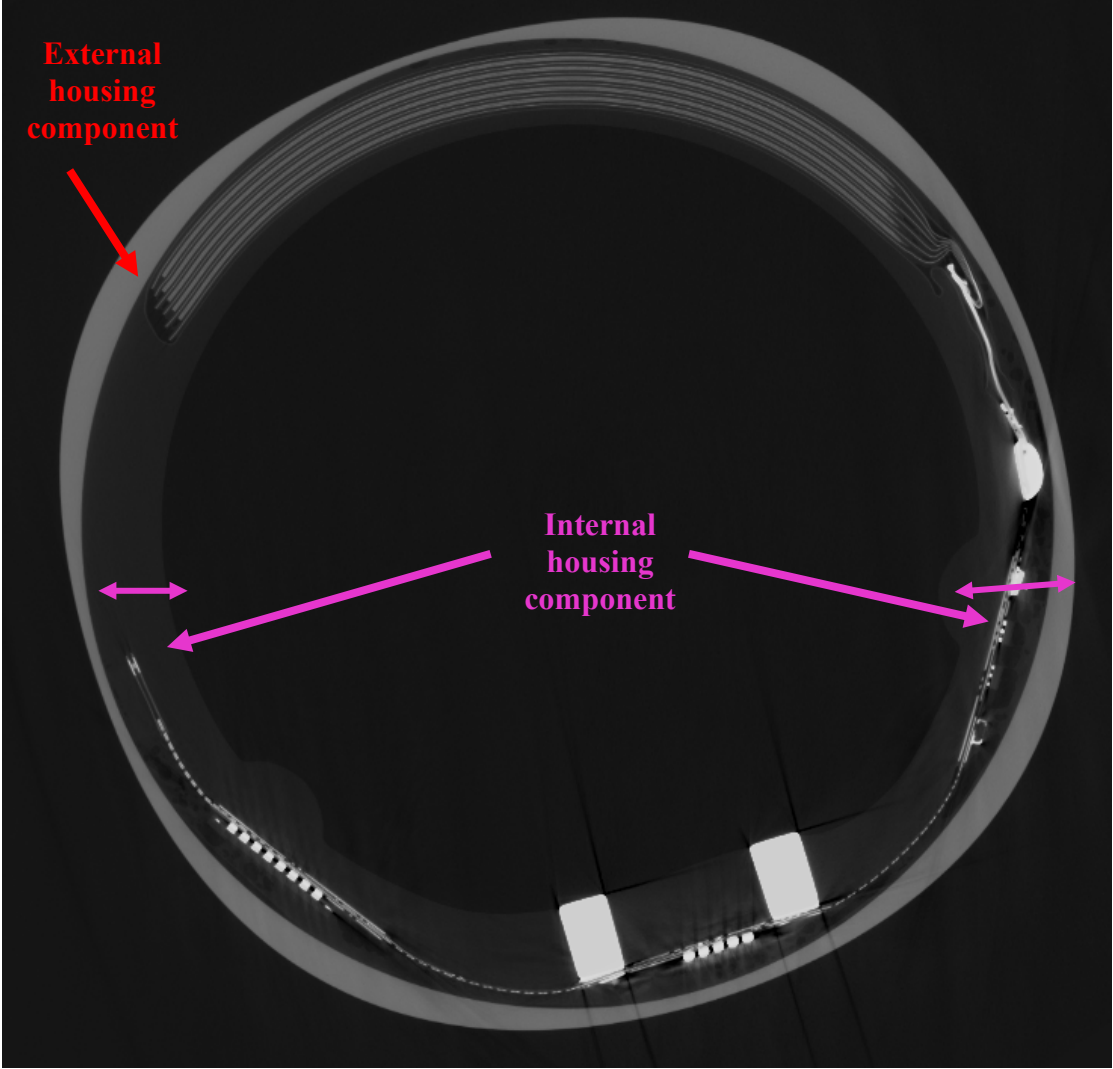
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p data-bbox="1136 451 1423 586">Internal housing component having an inner circumferential surface</p> <p>The image is an exploded view diagram of the RingConn Smart Ring. It shows four main components arranged in a row from left to right: 1. A polished metal ring. 2. A transparent internal housing component with a circular opening in the center. A green arrow points to the inner surface of this housing with the text 'Internal housing component having an inner circumferential surface'. 3. A black flexible printed circuit (FPC) board. 4. A black flexible printed circuit (FPC) board with various electronic components, including a red LED and a green LED. The components are shown in an exploded view, indicating they are assembled together.</p>

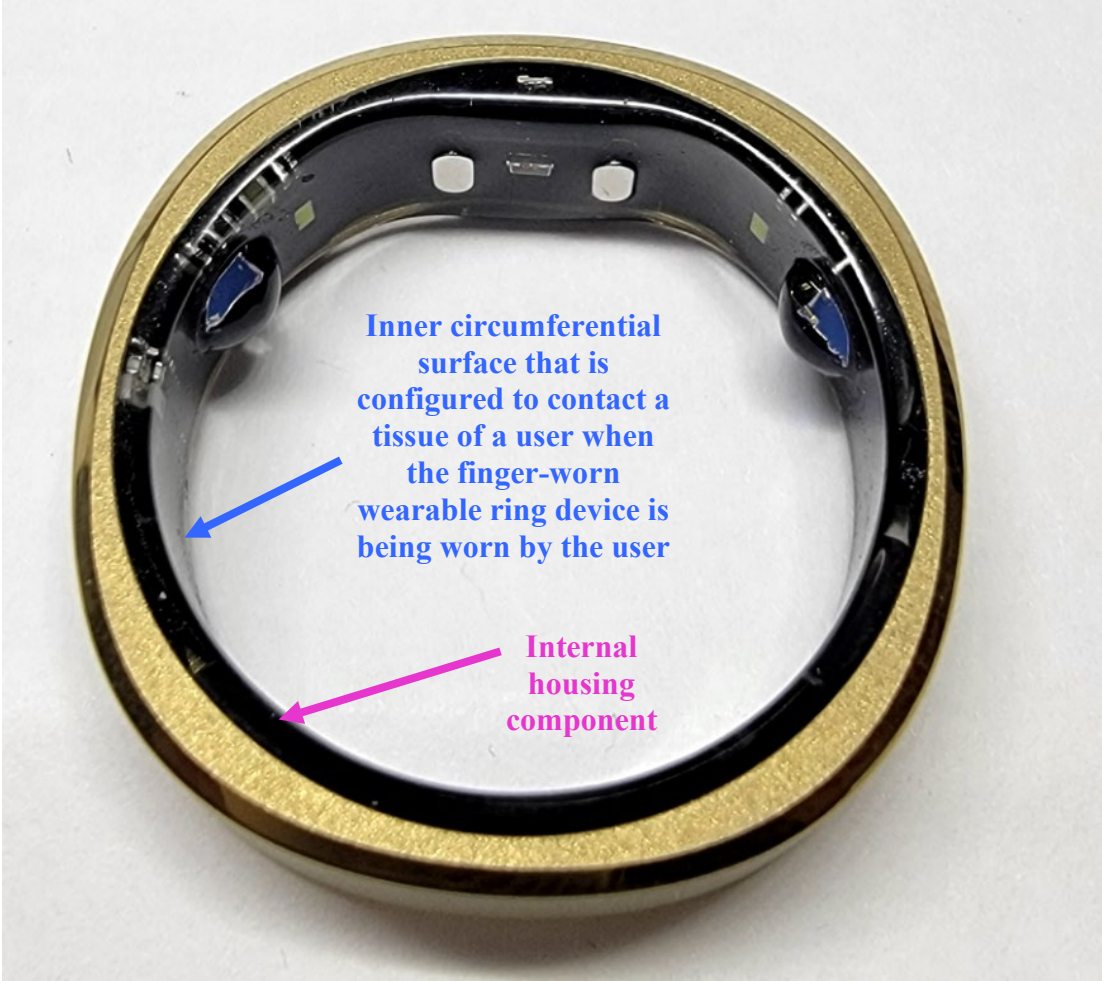
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
<p>[1-B2] the internal housing component coupled with the external housing component,</p>	<p>The Accused Products include the external housing component coupled with the internal housing component. Specifically, as shown below, the internal housing component (i.e., potting) is connected with the external housing (i.e., metal structure):</p>  <p>External housing component</p> <p>Internal housing component</p>


RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	

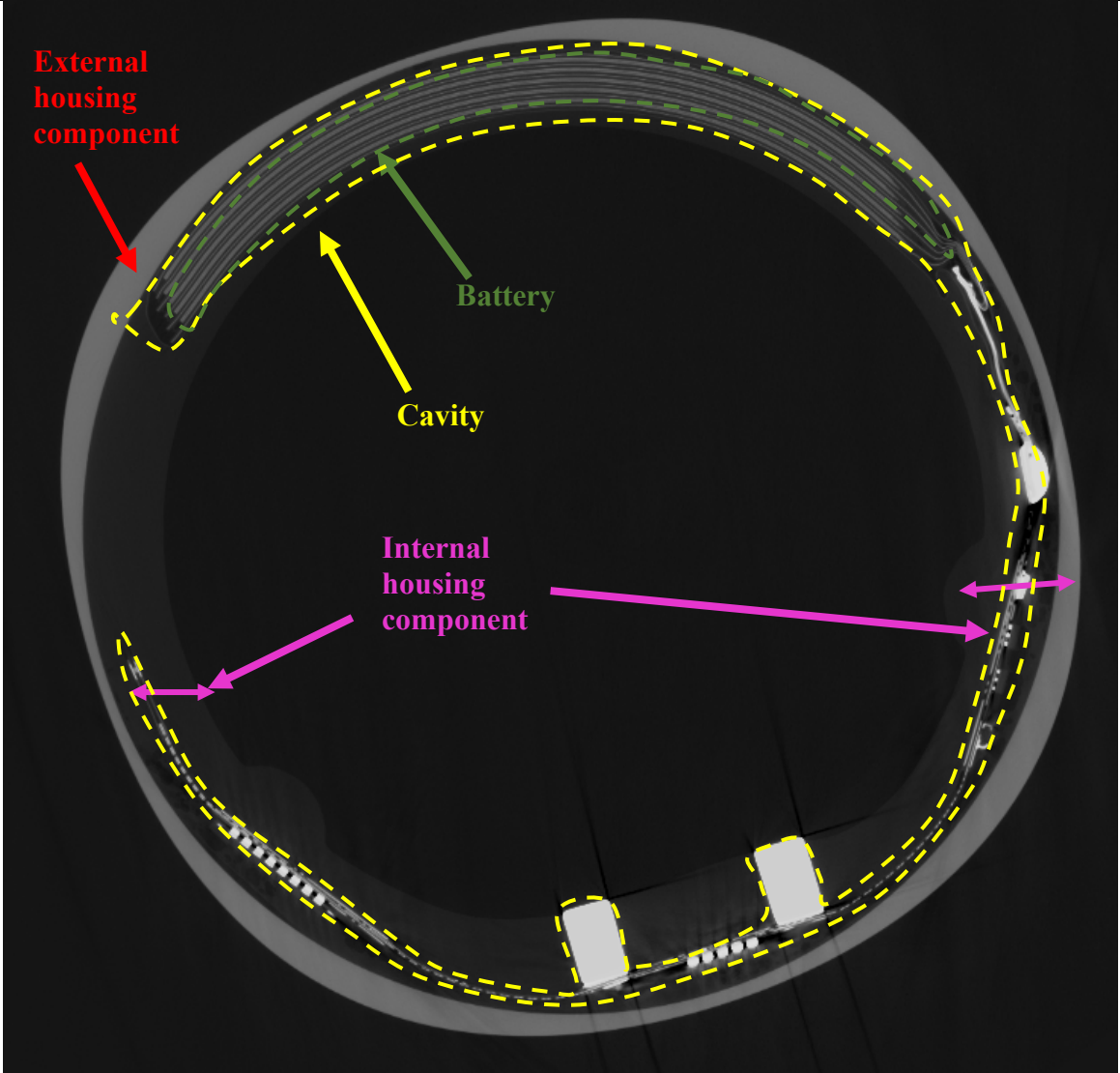
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
<p>[1-B3] wherein at least a portion of the inner circumferential surface of the internal housing component is configured to contact a tissue of a user when the finger-worn wearable ring device is being worn by the user;</p>	<p>The Accused Products include at least a portion of the inner circumferential surface of the internal housing component configured to contact a tissue of a user when the finger-worn wearable ring device is being worn by the user:</p>  <p>Inner circumferential surface that is configured to contact a tissue of a user when the finger-worn wearable ring device is being worn by the user</p> <p>Internal housing component</p>


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Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	<div data-bbox="646 370 791 406">RingConn</div> <div data-bbox="1268 367 1318 412"></div> <div data-bbox="1499 376 1587 399">Buy Now</div> <ul style="list-style-type: none"> • Compact and Stylish: Smart rings are generally small and lightweight, making them more discreet and comfortable to wear compared to larger wearable devices like smartwatches. • Fitness and Health Tracking: Smart rings may also monitor your sleep patterns, heart rate, blood oxygen saturation, activity tracking, and stress index and provide insights into your overall well-being. • Personalization and Customization: Smart rings often provide options for personalization, allowing you to choose different ring styles, colors, etc. • High accuracy and sensitivity: The finger's pulse signal is stronger and more accurate than the wrist, making it an ideal source of accurate heart rate data. <p>Which finger should the ring be worn for detection? Are there any specific requirements?</p> <p>Does wearing the ring on different fingers result in data deviation in detection?</p> <p>https://ringconn.com/products/smart-ring</p>
[1-C1] a battery positioned within a cavity formed between the internal housing component and the external housing component, wherein the battery	<p>The Accused Products include a battery positioned within a cavity formed between the internal housing component and the external housing component, wherein the battery comprises a shape and size configured to fit within the cavity between the outer circumferential surface of the external housing component and the inner circumferential surface of the internal housing component. If RingConn argues that the claimed element of “a cavity formed between the internal housing component and the external housing component” is not literally met (Plaintiff disputes any such characterization), this limitation is satisfied under doctrine of equivalents because any difference between the claim element and the accused element is insubstantial. Indeed, the accused element performs substantially the same function, in substantially the same way, to achieve substantially the same result as the claimed limitation, namely the space is formed between the external housing structure and internal potting structure that encloses the battery.</p> <p>As shown below, the battery occupies a cavity or hollow space between internal and external housing. Absent the battery and components, there would be a hollow space:</p>

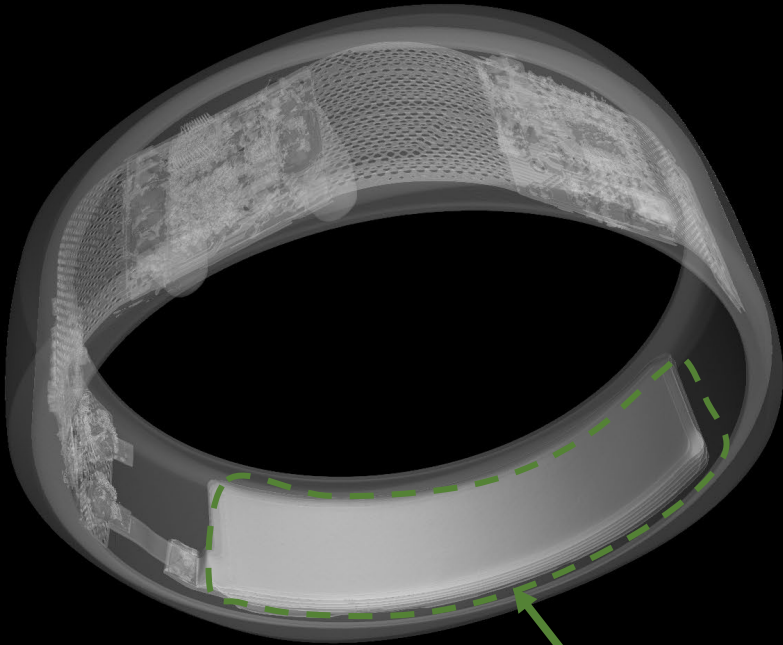
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
comprises a shape and size configured to fit within the cavity between the outer circumferential surface of the external housing component and the inner circumferential surface of the internal housing component,	

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Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p data-bbox="877 673 976 706">Battery</p>

RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	<p data-bbox="441 321 724 341">Volume 1 ⇒ Cylinder 1 alignment system</p> <p data-bbox="1885 321 1911 341">3D</p>  <p data-bbox="1302 1063 1417 1104">Battery</p> <p>The image is a 3D CAD model of a smart ring. The ring is shown in a perspective view, highlighting its internal components. A green dashed line outlines a rectangular section on the inner circumference of the ring, which is identified by a green arrow and the label 'Battery'. The ring's structure appears to be a combination of a solid outer shell and a mesh-like inner band. The background is black, and the model is rendered in a light gray color.</p>

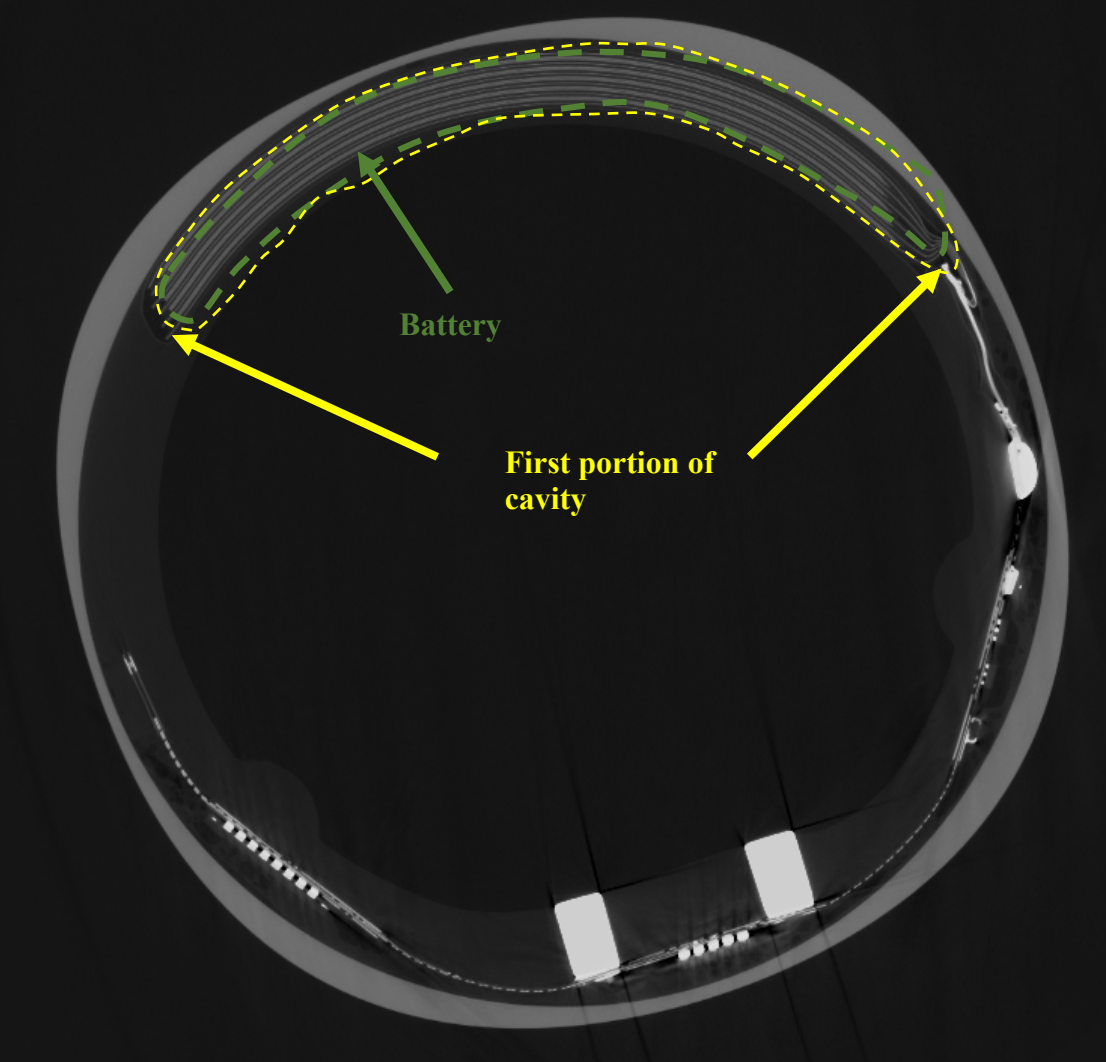
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p data-bbox="1100 1149 1419 1393">Curved battery positioned between the space formed by the external housing (metal structure) and internal housing (i.e., potting material)</p>


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Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
[1-C2] and wherein the battery extends through at least a first portion of the cavity of the finger-worn wearable ring device;	In the Accused Products, the battery extends through at least a first portion of the cavity of the finger-worn wearable ring device:

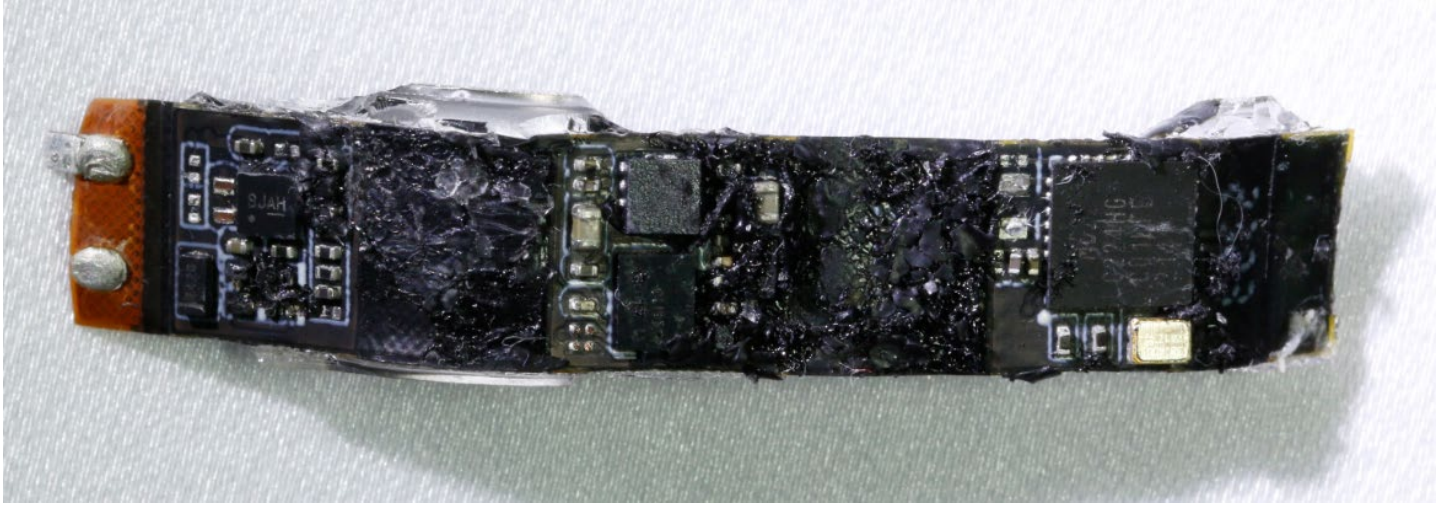
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p>The diagram is a cross-sectional view of a ring. A green dashed line outlines a curved region at the top of the ring's interior, labeled 'Battery' with a green arrow. Two yellow arrows point from the text 'First portion of cavity' to the inner surface of the ring, one pointing to the left and one pointing to the right, indicating the space within the ring's band.</p>

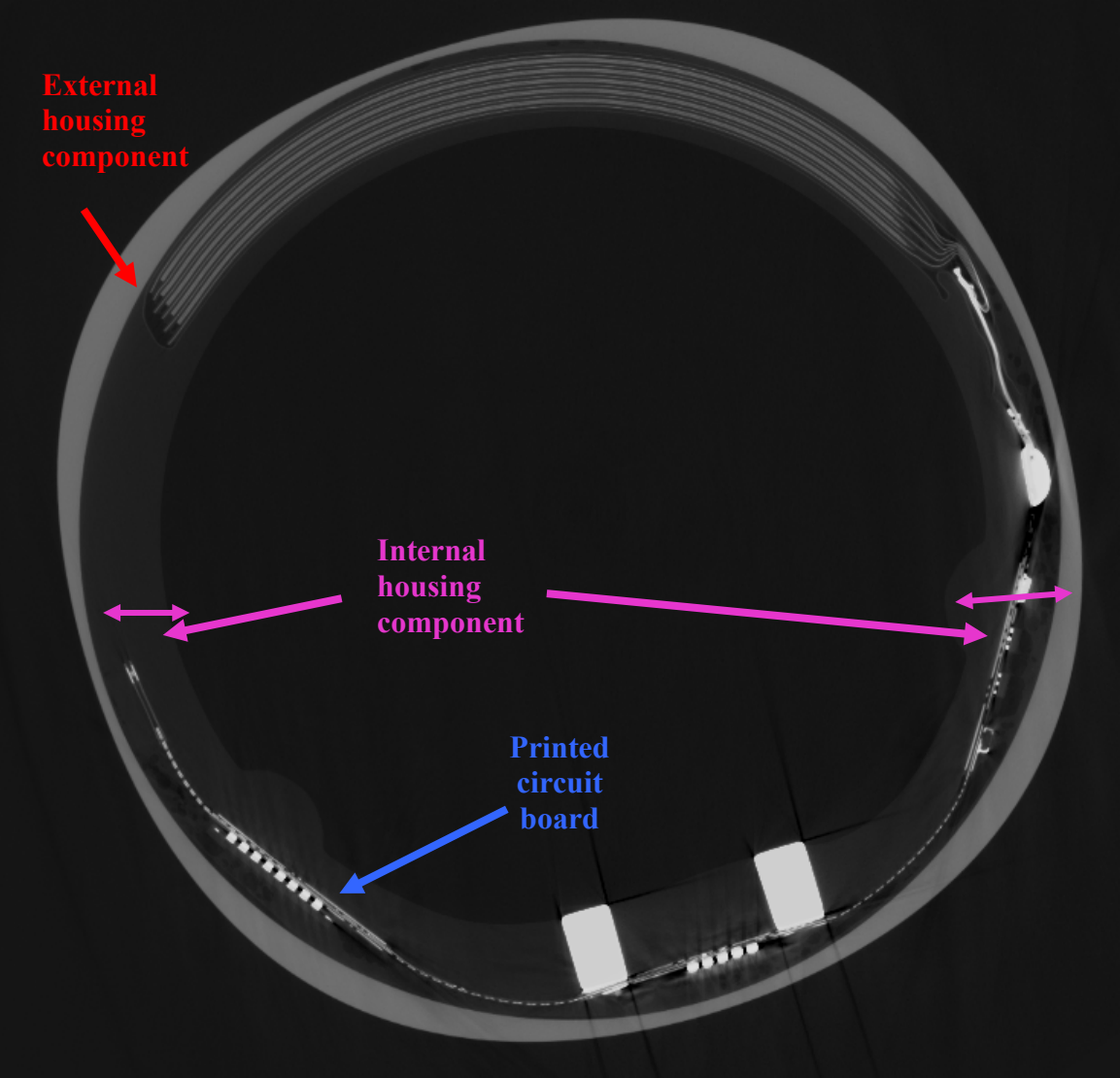
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	<p>In RingConn Smart Ring, Gen. 2, the battery also occupies the first portion of the cavity formed between the external metallic structure and the internal potting material. Absent the battery, there would be a hollow space in its place:</p> 
[1-D1] a printed circuit board	The Accused Products include a printed circuit board disposed between the internal housing component and the external housing component:


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Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
disposed between the internal housing component and the external housing component,	 A photograph of a RingConn Smart Ring, Gen. 1 and Gen. 2, showing the internal housing component and the external housing component. The device is a long, thin, black electronic component with various circuitry and components visible. It has a red and black striped section on the left end and a gold-colored section on the right end. The device is shown against a light blue background.

RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p>The diagram is a cross-sectional view of a smart ring. It features a thick, dark outer ring. A red arrow points to the outermost layer, labeled "External housing component". Inside this, there is a thinner, lighter-colored layer. A pink arrow points to this inner layer, labeled "Internal housing component". At the bottom of the ring, a blue arrow points to a curved, segmented structure, labeled "Printed circuit board". The PCB is positioned between the internal housing and the bottom of the external housing. The entire assembly is shown in a circular cross-section.</p>

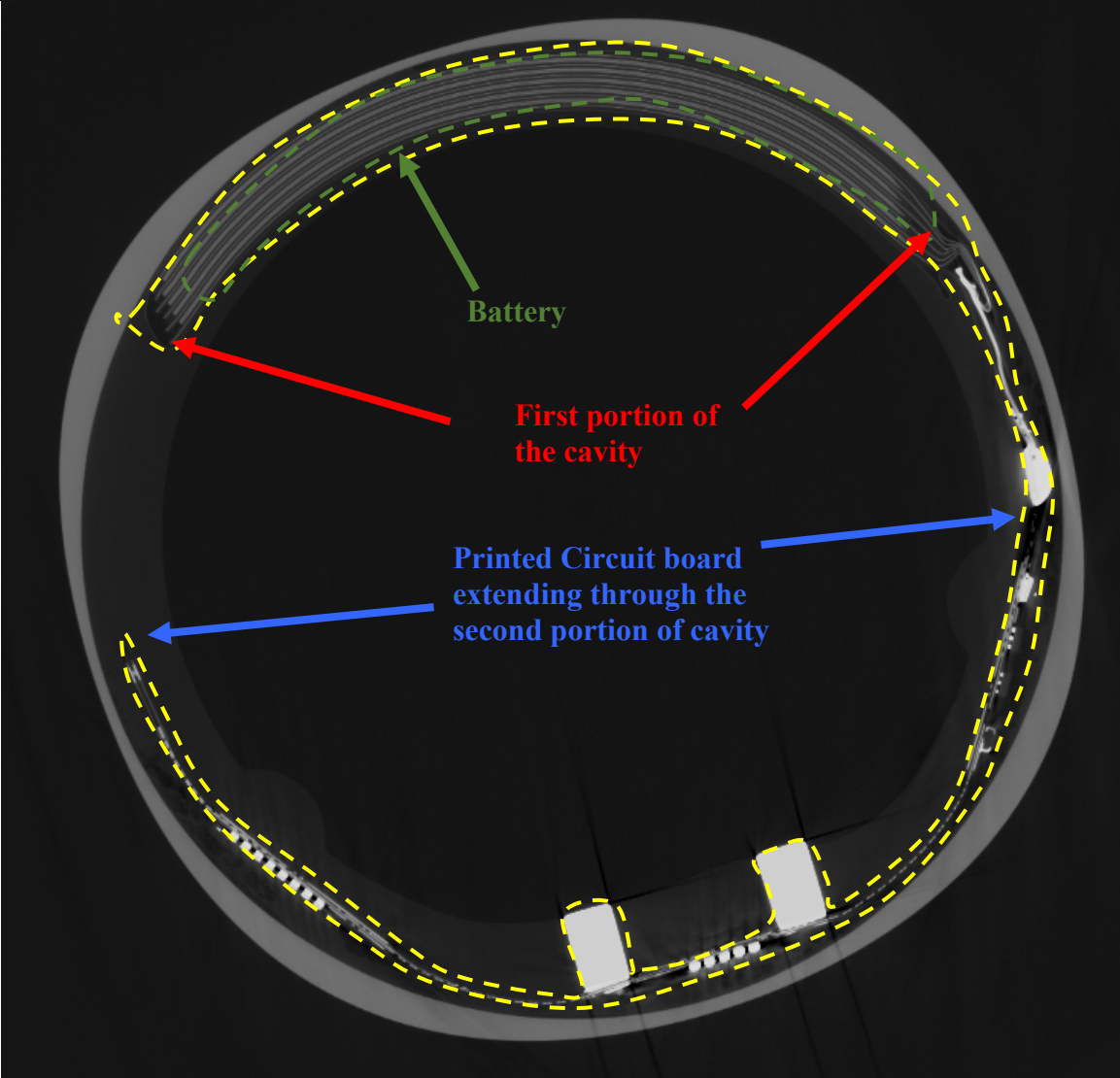
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p>Printed circuit board disposed between the internal housing and external housing</p>
[1-D2] wherein the printed circuit board	The Accused Products include the printed circuit board that extends through at least a second portion of the cavity of the finger-worn wearable ring device different from the first portion:


RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
extends through at least a second portion of the cavity of the finger-worn wearable ring device different from the first portion; and	

RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p>The diagram is a cross-sectional view of a smart ring. It features a central cavity. A green arrow points to a curved, segmented component labeled "Battery". Two red arrows point to the inner walls of the cavity, with the text "First portion of the cavity" in red between them. A blue arrow points to a thin, curved component labeled "Printed Circuit board extending through the second portion of cavity". The ring's outer edge is shown in grey, and the inner surface of the cavity is lined with a yellow dashed line. Several small, white, rectangular components are visible along the bottom inner edge of the ring.</p>

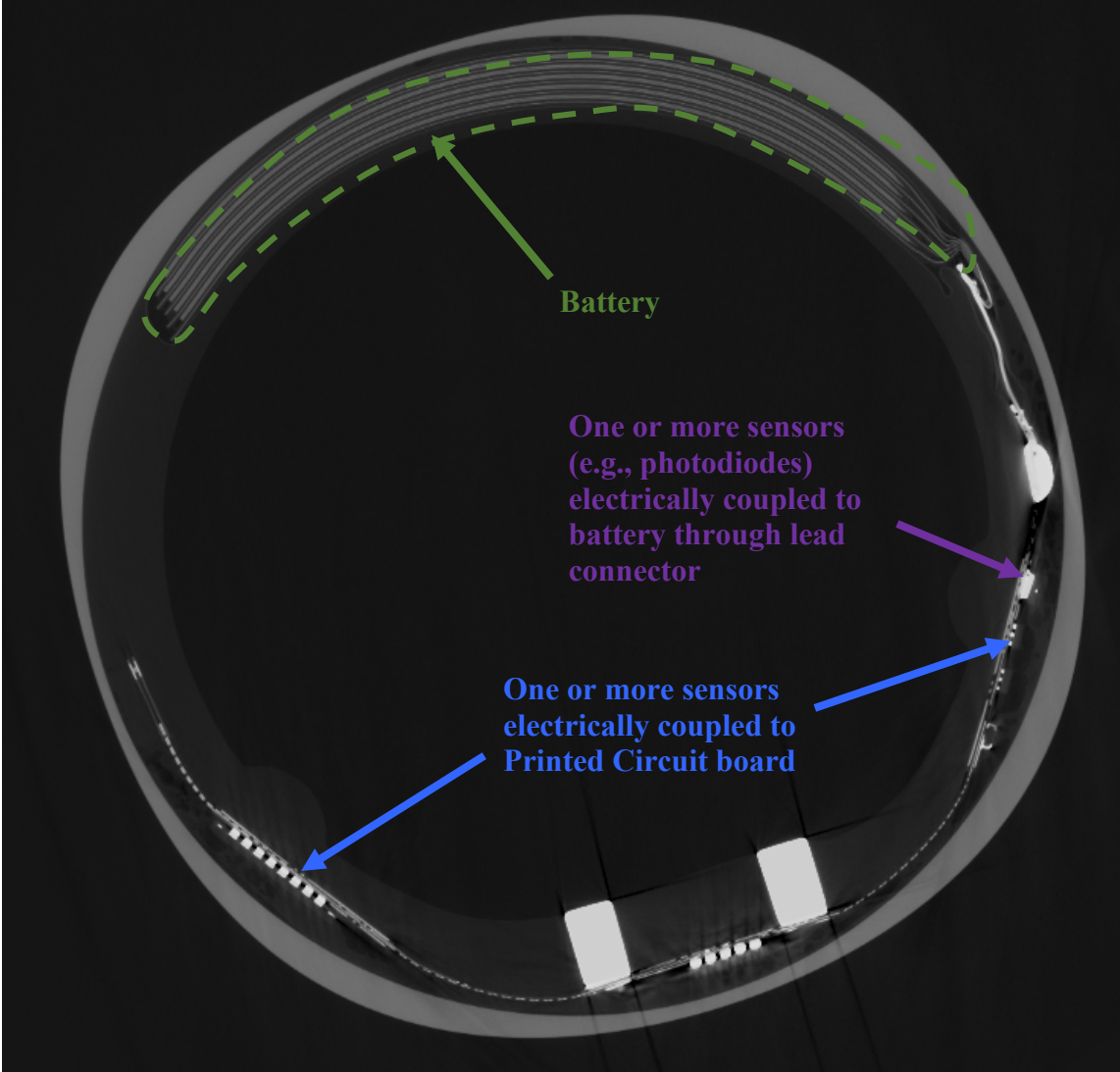
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p>Printed circuit board disposed between the internal housing and external housing</p>
[1-E] one or more sensors electrically coupled with the printed circuit	The Accused Products include one or more sensors electrically coupled with the printed circuit board and the battery and configured to acquire data from the user through the internal housing component:

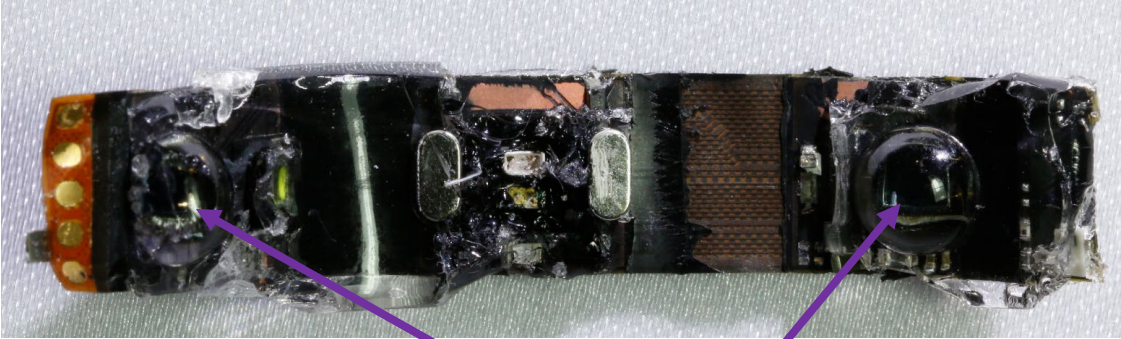
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Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
board and the battery and configured to acquire data from the user through the internal housing component.	<div data-bbox="667 337 1675 662"> <p>• Research-Grade Sensors</p> <p>3D Accelerometer</p> <p>Skin Temperature Sensor</p> <p>Multiple Photoplethysmography (PPG) Sensors</p> <p>Safe and Environmentally Friendly Materials</p> </div> <p data-bbox="401 743 926 781">https://ringconn.com/product/smart-ring/</p>

RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p>The diagram shows a cross-section of a smart ring. A green dashed line with an arrow points to a curved component labeled "Battery". A purple arrow points to a small component labeled "One or more sensors (e.g., photodiodes) electrically coupled to battery through lead connector". A blue arrow points to a component labeled "One or more sensors electrically coupled to Printed Circuit board".</p>

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Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	<div data-bbox="617 354 1730 691"></div> <p data-bbox="1100 695 1394 906">Photodiode Sensors coupled with the printed circuit board and the battery and configured to acquire data from the user</p>

RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p data-bbox="1255 1019 1575 1198">One or more sensors electrically coupled with the printed circuit board and the battery and configured to acquire data from the user through the internal potting</p>